

EXHIBIT 1

Fill in this information to identify the case:

Debtor 1 Michael Helmstetter

Debtor 2

(Spouse, if filing)

United States Bankruptcy Court Northern District of Illinois

Case number: 19-28687

FILED

U.S. Bankruptcy Court
Northern District of Illinois

6/15/2020

Jeffrey P. Allsteadt, Clerk

**Official Form 410
Proof of Claim**

04/19

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Do not use this form to make a request for payment of an administrative expense. Make such a request according to 11 U.S.C. § 503.

Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. **Do not send original documents**; they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

Part 1: Identify the Claim

1. Who is the current creditor?	<u>Brown, Udell, Pomerantz & Delrahim, Ltd.</u> Name of the current creditor (the person or entity to be paid for this claim) Other names the creditor used with the debtor _____	
2. Has this claim been acquired from someone else?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. From whom? _____	
3. Where should notices and payments to the creditor be sent? Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)	Where should notices to the creditor be sent? <u>Brown, Udell, Pomerantz & Delrahim, Ltd.</u> Name <u>Michael S. Pomerantz, BUPD Law</u> <u>225 W. Illinois Street, Suite 300</u> <u>Chicago, IL 60654</u> Contact phone <u>(312) 475-9900</u> Contact email <u>mpomerantz@bupdlaw.com</u> Uniform claim identifier for electronic payments in chapter 13 (if you use one): _____	Where should payments to the creditor be sent? (if different) _____ Name _____ Contact phone _____ Contact email _____
4. Does this claim amend one already filed?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Claim number on court claims registry (if known) _____ Filed on _____ MM / DD / YYYY	
5. Do you know if anyone else has filed a proof of claim for this claim?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Who made the earlier filing? _____	

Part 2: Give Information About the Claim as of the Date the Case Was Filed

6. Do you have any number you use to identify the debtor?	<input type="checkbox"/> No <input checked="" type="checkbox"/> Yes. Last 4 digits of the debtor's account or any number you use to identify the debtor:	5763											
7. How much is the claim?	\$ 218443.79	Does this amount include interest or other charges? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).											
8. What is the basis of the claim?	Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card. Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c). Limit disclosing information that is entitled to privacy, such as healthcare information. Legal services performed												
9. Is all or part of the claim secured?	<input type="checkbox"/> No <input checked="" type="checkbox"/> Yes. The claim is secured by a lien on property. Nature of property: <input type="checkbox"/> Real estate. If the claim is secured by the debtor's principal residence, file a <i>Mortgage Proof of Claim Attachment</i> (Official Form 410-A) with this <i>Proof of Claim</i> . <input type="checkbox"/> Motor vehicle <input checked="" type="checkbox"/> Other. Describe: Settlement proceeds recovered 14CH20208 Basis for perfection: Statutory attorney lien Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.) <table style="width: 100%;"> <tr> <td style="width: 50%;">Value of property:</td> <td style="width: 50%;">\$ 554625.00</td> </tr> <tr> <td>Amount of the claim that is secured:</td> <td>\$ 166621.52</td> </tr> <tr> <td>Amount of the claim that is unsecured:</td> <td>\$ 51822.27 (The sum of the secured and unsecured amounts should match the amount in line 7.)</td> </tr> </table> <table style="width: 100%;"> <tr> <td style="width: 60%;">Amount necessary to cure any default as of the date of the petition:</td> <td style="width: 40%;">\$ 166621.52</td> </tr> </table> <table style="width: 100%;"> <tr> <td style="width: 60%;">Annual Interest Rate (when case was filed)</td> <td style="width: 40%;">%</td> </tr> </table> <input checked="" type="checkbox"/> Fixed <input type="checkbox"/> Variable			Value of property:	\$ 554625.00	Amount of the claim that is secured:	\$ 166621.52	Amount of the claim that is unsecured:	\$ 51822.27 (The sum of the secured and unsecured amounts should match the amount in line 7.)	Amount necessary to cure any default as of the date of the petition:	\$ 166621.52	Annual Interest Rate (when case was filed)	%
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Amount necessary to cure any default as of the date of the petition:	\$ 166621.52												
Annual Interest Rate (when case was filed)	%												
10. Is this claim based on a lease?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Amount necessary to cure any default as of the date of the petition.\$												
11. Is this claim subject to a right of setoff?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Identify the property:												

12. Is all or part of the claim entitled to priority under 11 U.S.C. § 507(a)?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. <i>Check all that apply.</i>	<p>A claim may be partly priority and partly nonpriority. For example, in some categories, the law limits the amount entitled to priority.</p> <p><input type="checkbox"/> Domestic support obligations (including alimony and child support) under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B). \$ _____</p> <p><input type="checkbox"/> Up to \$3,025* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7). \$ _____</p> <p><input type="checkbox"/> Wages, salaries, or commissions (up to \$13,650*) earned within 180 days before the bankruptcy petition is filed or the debtor's business ends, whichever is earlier. 11 U.S.C. § 507(a)(4). \$ _____</p> <p><input type="checkbox"/> Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8). \$ _____</p> <p><input type="checkbox"/> Contributions to an employee benefit plan. 11 U.S.C. § 507(a)(5). \$ _____</p> <p><input type="checkbox"/> Other. Specify subsection of 11 U.S.C. § 507(a)() that applies \$ _____</p>	Amount entitled to priority
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* Amounts are subject to adjustment on 4/1/22 and every 3 years after that for cases begun on or after the date of adjustment.

Part 3: Sign Below

The person completing this proof of claim must sign and date it. FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157 and 3571.

Check the appropriate box:

- ☐ I am the creditor.
- ☒ I am the creditor's attorney or authorized agent.
- ☐ I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.
- ☐ I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.

I understand that an authorized signature on this Proof of Claim serves as an acknowledgment that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

I have examined the information in this Proof of Claim and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on date 6/15/2020
MM / DD / YYYY

/s/ Michael S. Pomerantz

Signature

Print the name of the person who is completing and signing this claim:

Name	<u>Michael S. Pomerantz</u>		
	First name	Middle name	Last name
Title	<u>Partner</u>		
Company	<u>Brown, Udell, Pomerantz & Delrahim, Ltd.</u>		
Address	Identify the corporate servicer as the company if the authorized agent is a servicer		
	<u>225 W. Illinois St., Suite 300</u>		
	Number Street		
	<u>Chicago, IL 60654</u>		
Contact phone	<u>(312) 475-9900</u>	Email	<u>mpomerantz@bupdlaw.com</u>



February 21, 2018

RETAINER AGREEMENT

BROWN UDELL POMERANTZ & DELRAHIM, LTD.
Michael S. Pomerantz • mpomerantz@bupdlaw.com
225 W. Illinois Street, Suite 300
Chicago, IL 60654
Phone: 312.475.9900 • Fax: 312.475.1188
www.bupdlaw.com

**WE WILL PROVIDE YOU WITH LEGAL SERVICES
IN ACCORDANCE WITH THIS AGREEMENT**

1. NAME OF CLIENT: Scott Kindybalyk Michael Helmstetter
2. ADDRESS 5859 N Kirby 3419 S. Parnell
Chicago, IL 60646 Chicago, IL 60616
PHONE NO: (847) 494-4921 (773) 892-7547
3. WORK AUTHORIZED.

3.1 Services to be Provided.

You have engaged us to represent you, New City Historic Auto Row, LLC., and New City Auto Group, with respect to: (i) general corporate matters; (ii) Santander Bank, N.A. v. New City Historic Auto Row LLC., Case No. 18-CV-201; (iii) certain acquisitions of real estate in the Chicagoland area; and (iv) any other matter(s) for which you request our representation.

3.2 Other Work.

General consultation as specifically requested by the client, and such other work as may be requested or authorized from time to time by you and your authorized representatives. However, representation in other litigation matters requires a writing to be signed by both client and attorney authorizing such representation.

4. HOURLY RATES.

Shareholder rates are \$495.00 per hour. Partner hourly rates are \$425.00-\$475.00. Associate hourly rates are \$375.00-450.00. Paralegal and law clerk hourly rates are \$150.00. Mr. Pomerantz's current rate is \$495.00. These rates will not change unless an advance 30-day written notice is given. Brown, Udell, Pomerantz & Delrahim, Ltd., ("BUPD") reserves the right to assign the attorneys to each matter who BUPD determines best suits the client's needs and the economics of the project.

5. OUT-OF-POCKET EXPENSES.

5.1 What we charge for:

Client's Initials

BUPD Initials



Our minimum charge for legal services is based on our hourly rates. This includes meetings, telephone conferences, research, intra-office conferences, court time, all time spent working on your file and travel. We also charge for our out-of-pocket expenses for outside services (such as messengers, process servers, witness fees, court reporters and overtime secretarial or word processing fees if a client has a legal emergency) and overnight mail, filing fees, parking expenses and travel at 35¢ per mile, and copying charges.

5.2 What we do not charge for:

We do not charge for costs involved in setting up a file, normal secretarial or word processing time, fax sending or receiving, non-litigation postage or normal mailing.

6. BILLING INFORMATION.

6.1 Billing Units.

Time is billed in one-quarter (1/4) hour units.

6.2 When Billed.

Time is recorded when worked and billed monthly. You should receive a statement shortly after the 1st of each month. Delay in our billing does not waive our fees.

6.3 Questioning Bills.

If we have not heard from you in writing within ten (10) days after sending our statement, we assume the statement is accurate. Therefore, if you have any questions about your bill, please contact us in writing during that period.

6.4 Joint & Several Liability.

If we are to represent more than one client, then each of you agrees that your liability for all attorneys' fees and expenses incurred will be joint and several (meaning each of you is liable for the entire amount). If our services include becoming attorney of record in a lawsuit, you are to be responsible for the bills with respect to each of the parties we represent. Any allocations or apportionment of liability must be worked out among you as a group and are not our concern.

6.5 Descriptions.

Bills are generally computer-generated and contain a detailed description of the services performed, the period during which they were performed, and the time involved.

6.6 Client Trust Account.

Client's Initials

BUPD Initials



A client trust account will be maintained to cover out-of-pocket expenses. This account will be debited as these expenses are incurred and credited with additional deposits as may be required. A statement may be sent to you periodically, requesting additional funds for this account.

6.7 Payment by Credit Card.

We currently offer our clients the convenience of paying by MasterCard or VISA. If you desire to pay an invoice by credit card, simply complete the authorization form attached to the invoice and return to BUPD for processing.

7. ESTIMATES.

Unless the term "estimate" is used below to indicate that we believe a service will cost a specific amount, we are making no estimate of the amount to be charged. If an estimate is used below, the estimate is premised upon there being no unforeseen contingencies which would require us to devote more time to your matter than is customary for us.

8. DELINQUENCY.

8.1 Stop Work.

Payment is due within thirty (30) days from each statement's date. If you do not pay promptly or make other arrangements, we reserve the right to cease work on all such matters entrusted to us until satisfactory payment arrangements are made.

8.2 Service Charge. Not applicable.

8.3 Lien for Unpaid Fees

You agree that BUPD has a lien for unpaid attorney's fees against any recovery, award, settlement or judgment. This lien survives any termination of representation.

9. TERMINATION.

9.1 By Either Of Us.

The attorney-client relationship may be terminated by either of us for any reason upon written notice to the other.

9.2 Costs Of Transition.

If you terminate this agreement, we will cooperate with you and your new attorney. However, you agree to pay our time and costs incurred in the transition.

9.3 Substitute New Counsel In Litigation.

Client's Initials

BUPD Initials



If we have made a formal or general appearance in a court or other proceeding, you agree to execute a substitution at our request in favor of other counsel or you acting as your own counsel.

10. ERRORS & OMISSIONS INSURANCE.

Our firm maintains errors and omissions insurance. To the best of our knowledge, the insurance coverage is applicable to the services to be rendered under this Agreement.

11. MONITORING THE LAW ON YOUR BEHALF.

11.1 Limited.

As a matter of course we keep up with changes in the law. While preparing documents for you or giving you advice, we will take those developments into account.

Also, from time to time we may mail without cost general information about legal developments to clients, former clients and referral sources.

11.2 Not Automatic.

However, without separate arrangements and a payment of an appropriate fee, once we have given you the advice you requested or provided you draft documents, we do not automatically monitor the law for you or advise you of new developments in the law.

12. NO TAX ADVICE.

We cannot advise you on whether any issue in litigation or any settlement or resolution of your case has adverse tax consequences. Please let us know if you need tax advice and we will be happy to refer you to a tax specialist.

13. INITIAL RETAINER.

13.1 Advance Payment Retainer.

We will require an initial advance payment retainer fee of \$ 10,000.00 (the "Retainer"), payable to BUPD. The Retainer will be deposited into BUPD's client trust account. In the event you refuse to pay the Advance Payment Retainer, BUPD would not accept your case as BUPD needs to allocate time and resources so that we can properly staff and represent you with respect to this matter. BUPD does not take every case offered to it for representation and as such, are committing its resources to you and thus requesting the Advance Payment Retainer. This Advance Payment Retainer will be applied against fees. Once the Retainer has been exhausted, we expect you to pay all bills pursuant to this Agreement. We reserve the right to require you to deposit another Retainer in the event your initial Retainer is exhausted and you do not pay your bills in a timely manner.

13.2 Cost Retainer.

Client's Initials

BUPD Initials



13.3 Trial Retainer.

If we handle litigation on your behalf, no later than 90 days before trial (or arbitration as the case may be), you agree to deposit upon our written request a trial retainer of \$25,000.00 per expected day of trial or arbitration. Failure to deposit this retainer shall constitute valid grounds for withdrawal of representation by BUPD.

14. COUNTERPARTS.

This Agreement may be executed in counterparts and each counterpart shall be deemed an original. A signature that is transmitted by telecopier or other facsimile equipment shall be deemed an original signature.

15. ARBITRATION.

It is understood and agreed that any claims by you arising out of the rendition or lack of rendition of services under this Agreement, including claims of legal malpractice, shall be determined by submission to final and binding arbitration, and not by a lawsuit or resort to court process except as provided by law for judicial review or enforcement of arbitration proceedings. This includes any claim that any legal services rendered under this contract were unnecessary or unauthorized or were improperly, negligently or incompetently rendered.

All parties to this contract, by entering into it, are giving up their constitutional right to have any such dispute decided in a court of law before a jury, and instead are accepting the use of arbitration. Client may wish to seek outside advice or counsel concerning this procedure.

The proceedings will be administered by the American Arbitration Association as agreed by the parties in accordance with their then existing rules of Practice and Procedure, with venue in Chicago, Illinois. Said provision to arbitrate does not apply to any claims brought by BUP against you, the client, for your failure to comply with the terms of this Agreement.

At the termination of the representation and for a period of thirty (30) days thereafter, and provided there are not outstanding unpaid statements for fees and charges owed by you to our firm, you shall have the right on request to take possession of your file. In such event, our firm at its expense may make and retain copies of all or portions of the file. If you do not request possession of the file within such thirty (30) day period, our firm will have no further responsibility for the retention and maintenance of the file and may at its option dispose of all or parts of the file without further notice to you. The thirty (30) day document retention policy does not apply to documents required to be maintained and destroyed per the requirements of the H.I.P.A.A.

NOTICE: BY SIGNING THIS RETAINER AGREEMENT YOU ARE AGREEING TO HAVE ANY ISSUE OF LEGAL MALPRACTICE DECIDED BY NEUTRAL ARBITRATION AND YOU ARE GIVING UP YOUR RIGHT TO A JURY OR COURT TRIAL.

Client's Initials

BUPD Initials



I understand and agree to the terms under which BUPD will provide services to me.

DATE: 2/22/18

Scott Kindybalyk

DATE: 2/22/18

Michael S. Helmstetter

DATE: 2/22/18

NEW CITY HISTORIC AUTO ROW, LLC

BY:

ITS:

Via Rpt.

DATE: 2/22/18

NEW CITY AUTO GROUP

BY:

ITS:

Via Rpt.

BROWN, UDELL, POMERANTZ & DELRAHIM, LTD., AGREES TO THE PROVISIONS OF THIS AGREEMENT:

DATE: 2/22/18

SIGNATURE ON BEHALF OF BUPD

Client's Initials

BUPD Initials

BROWN UDELL POMERANTZ & DELRAHIM, LTD.
Michael S. Pomerantz • mpomerantz@bupdlaw.com
225 W. Illinois Street, Suite 300
Chicago, IL 60654
Phone: 312.475.9900 • Fax: 312.475.1188
www.bupdlaw.com

October 26, 2018

Via U.S. Mail & Electronic Mail
Michael Helmsstetter
3419 South Parnell Ave.
Chicago, Illinois 60616
mikehelmsstetter@hotmail.com

RE: ***Helmsstetter v. Ruscitti, et al., Case No. 14CH20208 (the "Lawsuit")***

Dear Michael:

The purpose of this letter is to provide you and BROWN, UDELL, POMERANTZ & DELRAHIM, LTD. ("BUPD") with a written memorandum of the terms and conditions under which, and the extent to which, we are undertaking to represent you in connection with your existing Lawsuit and claims (the "Claims") against Richard Ruscitti, Kingdom Chevrolet, Inc., and Western Avenue Nissan, Inc. (the "Defendants").

As you know, per your request, we have already spent some time in telephone conferences with you and investigating the Claims, as well as speaking with your former counsel, Mark Lyman, and a representative of Defendants, a number of which BUPD represented years ago. We understand that you are not happy with your current counsel, and we have agreed to represent you, as described below, in connection with the Claims.

As discussed, we will represent you with respect to the Claims on a hybrid/contingency basis, as outlined herein. If we are successful in negotiating a settlement on your behalf with the Defendants in excess of the most recent written offer of \$400,000.00, or if litigation is continued against the Defendants and there is any recovery on your part, including any settlement, our firm's fees shall, after payment of all Costs and Expenses (as defined below), be twenty one percent (21%) of (1) the total gross total dollar amount of any settlement reached between you and any of the Defendants or any related or affiliated party and (2) the total dollar amount of any judgment entered by a court-of-law, arbitrator, or mediator. In addition, you agree to pay BUPD a reduced hourly rate of \$250.00 per hour for any BUPD attorneys which BUPD assigns to this matter, *but only* if there is a recovery on your part, including any settlement reached between you and any of the Defendants or any related or affiliated party, in excess of \$400,000.00. This is almost a 50% discount off of our current shareholder rates of \$495.00 per hour, in recognition of the contingency portion of our fees. Our current non-shareholder partner hourly rates are \$425.00-\$475.00, and associate hourly rates are \$375.00-450.00.

You hereby agree that BUPD has the authority to settle the Lawsuit and Claims on your behalf in exchange for any amount in excess of \$2 million dollars. *ADD 1/2 (\$2,500,000.00)*

Irrespective of whether the Claims are settled or continued litigation proves necessary, and irrespective of any outcome, you agree to reimburse our firm, on a monthly basis, for all out-of-pocket expenses and cost charges (including, without limitation, for photocopying, facsimile transmissions, express courier services, long-distance telephone calls, computerized research, travel, and other expenses and charges) which have already been incurred by our firm, or which are hereafter incurred by our firm, in representing you in connection with the Claims (collectively, the "Costs and Expenses"). Statements for Costs and Expenses

MSJ

will be sent to you on a monthly basis and all rendered statements are payable on receipt. If a client's bill remains unpaid for more than thirty (30) days from the billing date, a service charge of one and one-half percent (1.5%) is added each month to the unpaid balance.

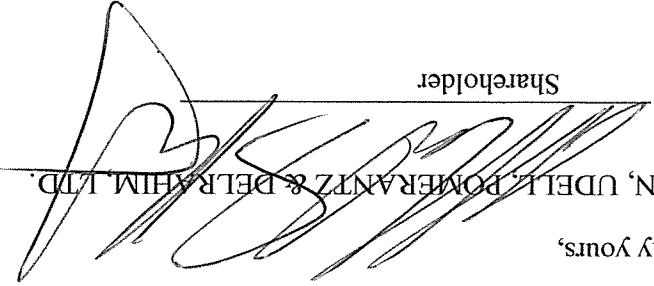
A client has the right to terminate representation by this firm at any time, in which case we ask to be so advised in writing. On the other hand, we reserve the right to withdraw from representing a client in any matter if a client's account remains unpaid for thirty (30) days from the billing date, if a client has misrepresented or failed to disclose material facts to us, if a client chooses not to follow our advice, or if for the fees and costs to the date of termination or withdrawal, including any reduced hourly fees incurred, plus the above-referenced twenty one percent (21%) contingency fee.

If, at any time, you have questions concerning this statement or the above-referenced matters, please do not hesitate to contact me. **I remind you that in order to protect the confidentiality of both your communications with us and our advice to you under the attorney-client privilege, please do not divulge them to, or discuss them with, anyone else.**

If the foregoing meets with your approval, please date and sign this letter where indicated and return it to me by facsimile. For purposes of finalizing this letter agreement, any signed document, including this letter, transmitted by facsimile machine shall be treated in all manner and respects as an original document, and the signature of any party on such facsimile document shall be considered an original document and have the same force and effect as an original document. Please keep a signed copy of this letter for your files.

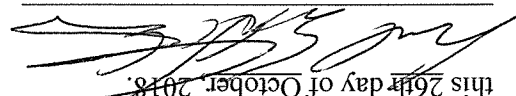
We look forward to working with you.

Very truly yours,


By: **BROWN, UDEL L. POMERANTZ & DELRAHIM, LTD.**
Shareholder

ACCEPTED and AGREED

this 26th day of October, 2018.



Michael Helmsletter

Invoice submitted to:
Mike Helmsletter
465 N. Park Drive Apt. 308
Chicago, IL 60611

March 17, 2020

In Reference To: Helmsletter v. Ruscitti, et al.

Invoice # 158139

Matter # 5763-003-LI-18

Professional Fees

11/08/2018	Michael S. Pomerantz	Review numerous documents and correspondence; conference with Andrew Jacobson and Shelley Smith; work on outline of case and issues; telephone call to Gary Blackman; telephone call to client.	250.00	2.75	687.50
11/08/2018	Shelley Smith	Discussed case with Andy Jacobson and read his summary (.20).	250.00	0.20	50.00
11/09/2018	Michael S. Pomerantz	Review additional emails and documents; conference with Shelley Smith regarding summary memo; correspondence to Gary Blackman.	250.00	1.75	437.50
11/09/2018	Shelley Smith	Phone call with Michael Pomerantz regarding status and strategy (.20); created chronology and included facts derived from document review (2.0).	250.00	2.20	550.00
11/11/2018	Shelley Smith	Reviewed documents and took notes on same for chronology and document requests (2.0); sent email regarding password protected documents to Pomerantz and Cromwell (.10).	250.00	2.10	525.00
11/12/2018	Michael S. Pomerantz	Various conferences; review documents and flash drive; telephone conference with Gary Blackman; discuss settlement; review file for tax returns and K-1's.	250.00	2.25	562.50
11/12/2018	Michael S. Pomerantz	Review correspondence from client and Moody regarding substitution of counsel; work on motion.	250.00	0.75	187.50
11/13/2018	Michael S. Pomerantz	Various conferences and telephone calls; work on motion to substitute, et. al; correspondence with opposing counsel and client.	250.00	1.25	312.50
11/13/2018	Shelley Smith	Met with Andy Jacobson regarding consent to substitution and motion for substitution of attorneys, drafted motion for substitution of attorneys and circulated same, phone call with Pomerantz, revised and filed Notice of Motion, and Motion for Substitution of Counsel with exhibits (1.20); reviewed documents and continued adding to chronology (1.50);	250.00	2.70	675.00

BROWN UDELL POMERANTZ & DELRAHIM, LTD.

225 West Illinois Street, Suite 300 Chicago, IL 60654 • Phone: 312.475.9900 • Fax: 312.475.1188

BROWN UDELL POMERANTZ & DELRAHIM, LTD.

11/14/2018	Michael S. Pomerantz	Review and work on summary of documents and chronology; various telephone calls and correspondences.	250.00	1.75	437.50
11/14/2018	Shelley Smith	Reviewed documents and added information to chronology, circulated same (2.9).	250.00	2.90	725.00
11/15/2018	Michael S. Pomerantz	Correspondence and conferences with Andrew Jacobson and Shelley Smith.	250.00	0.75	187.50
11/16/2018	Michael S. Pomerantz	Telephone call to client; conferences with Andrew Jacobson and Shelley Smith regarding 11/26/2018 hearing, et. al.	250.00	1.00	250.00
11/20/2018	Michael S. Pomerantz	Correspondence with client and Lindsey.	250.00	0.50	125.00
11/21/2018	Michael S. Pomerantz	Telephone call with client regarding status and strategy moving forward; correspondence with opposing counsel.	250.00	0.50	125.00
11/21/2018	Michael S. Pomerantz	Review correspondence and shard distribution information received from client.	250.00	0.25	62.50
11/26/2018	Michael S. Pomerantz	Conference with Andrew Jacobson; review motion allowing substitution of counsel; telephone call with client.	250.00	1.25	312.50
11/28/2018	Michael S. Pomerantz	Review file and documents; conference with Andrew Jacobson regarding discovery and requests to admit; work on same; telephone call with client.	250.00	1.25	312.50
11/29/2018	Michael S. Pomerantz	Telephone call with client; review file and documents; prepare requests to admit; correspondence with opposing counsel.	250.00	2.75	687.50
11/30/2018	Michael S. Pomerantz	Review numerous correspondence and documents from client regarding insurance and warranty companies, et. al.	250.00	2.00	500.00
12/05/2018	Michael S. Pomerantz	Telephone calls with client; correspondence with opposing counsel; forward warranty information to Andrew Jacobson.	250.00	0.75	187.50
12/11/2018	Michael S. Pomerantz	Correspondence to opposing counsel and send along with requests to admit; telephone call with client.	250.00	0.75	187.50
12/12/2018	Michael S. Pomerantz	Review defendant's notices of records subpoenas to Hyundai JP Morgan, Nissan and commercial credit; correspondence with opposing counsel; telephone call with client; review additional correspondence from opposing counsel regarding RTA.	250.00	1.25	312.50
12/17/2018	Michael S. Pomerantz	Review defendant's motion to strike requests to admit; conference with Andrew Jacobson regarding same.	250.00	0.50	125.00
12/19/2018	Michael S. Pomerantz	Correspondence and telephone call with client; telephone call with intermediary regarding potential resolution; review court order entered.	250.00	1.00	250.00

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01/09/2019	Michael S. Pomerantz	Conference with Andrew Jacobson; review court order; telephone call with client.	250.00	0.75	187.50
01/10/2019	Michael S. Pomerantz	Correspondence with opposing counsel regarding settlement and threats of disqualification; review documents, outline discovery regarding warranty, re-insurance issues.	250.00	1.50	375.00
01/14/2019	Glenn M. Kanter	Review settlement and discovery status and determine strategy for same going forward.	250.00	0.40	100.00
01/14/2019	Michael S. Pomerantz	Review file and documents; correspondence to opposing counsel and client regarding settlement; work on discovery regarding warranty/re-insurance issues.	250.00	1.50	375.00
01/17/2019	Glenn M. Kanter	Review emails re: settlement status and work on discovery requests.	250.00	0.60	150.00
01/17/2019	Michael S. Pomerantz	Correspondence with opposing counsel and client regarding potential resolution; telephone call with client; telephone call to bankruptcy counsel.	250.00	1.00	250.00
01/22/2019	Michael S. Pomerantz	Correspondence with client; work on and finalize discovery regarding re-insurance and warranty issues.	250.00	1.50	375.00
01/24/2019	Michael S. Pomerantz	Correspondence with opposing counsel; work on insurance and warranty issues; discovery and claims.	250.00	1.00	250.00
01/29/2019	Michael S. Pomerantz	Revise discovery to include requests for tax info, et. al.	250.00	0.50	125.00
02/01/2019	Michael S. Pomerantz	Numerous telephone calls and correspondence regarding arbitration, et. al.	250.00	0.75	187.50
02/06/2019	Michael S. Pomerantz	Correspondence with Chuhak regarding Ruscitti IRS issues; telephone call to same; telephone call to client.	250.00	0.50	125.00
02/07/2019	Michael S. Pomerantz	Review correspondence from client and Ed Lira; telephone call to same.	250.00	0.50	125.00
02/12/2019	Michael S. Pomerantz	Correspondence with Helmsletter's formal divorce counsel, Andrew Jacobson, etc.; correspondence with Chuhak; research regarding attorney's lien.	250.00	1.50	375.00
02/14/2019	Michael S. Pomerantz	Several correspondences; finalize and send attorney lien letter; review stipulations from opposing counsel; conference with Andrew Jacobson.	250.00	1.00	250.00
02/18/2019	Michael S. Pomerantz	Review court order; telephone calls and correspondences with client.	250.00	1.00	250.00
02/25/2019	Michael S. Pomerantz	Correspondence and telephone calls with client;	250.00	0.50	125.00
02/26/2019	Michael S. Pomerantz	Telephone call with client; telephone call with Steve Varhola and Mark Lyman regarding prior discovery; conferences with Andrew Jacobson regarding discovery and stipulations; review correspondence from Chuhak; conference with Andrew Jacobson;	250.00	1.25	312.50

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02/27/2019	Michael S. Pomerantz	Review several correspondences from client; forward to Andrew Jacobson; telephone call with same.	250.00	0.75	187.50
03/06/2019	Michael S. Pomerantz	Review Western Ave Nissan and Kingdom Chevy responses to document production requests regarding insurance and warranty; telephone call with Andrew Jacobson.	250.00	1.00	250.00
03/11/2019	Michael S. Pomerantz	Telephone call with Steve Varhola regarding discovery documents, et al.	250.00	0.25	62.50
03/12/2019	Michael S. Pomerantz	Review correspondence and document requests from client; correspondence and meeting with Andrew Jacobson.	250.00	0.50	125.00
03/13/2019	Michael S. Pomerantz	Correspondence with client, Bryan King and Andrew Jacobson regarding discovery issues.	250.00	0.50	125.00
03/18/2019	Michael S. Pomerantz	Correspondence and telephone call with Steve Varhola regarding document turnover.	250.00	0.50	125.00
03/19/2019	Michael S. Pomerantz	Numerous correspondence and telephone calls with client and correspondence with Steve Varhola.	250.00	0.75	187.50
03/21/2019	Michael S. Pomerantz	Correspondence and telephone calls with client and Steve Varhola regarding document turnover, et al;	250.00	0.75	187.50
04/01/2019	Michael S. Pomerantz	Correspondence and telephone call with client.	250.00	0.25	62.50
04/04/2019	Michael S. Pomerantz	Review correspondence and dealer statements from client.	250.00	0.50	125.00
04/08/2019	Bryan D. King	Conference with Michael Pomerantz re: status of cases; review complaint and related documents.	250.00	1.10	275.00
04/08/2019	Michael S. Pomerantz	Review correspondence and dealer statements from client; conference with Andrew Jacobson.	250.00	0.50	125.00
04/09/2019	Bryan D. King	Review case file and documents; prepare notes re: dealership tax return summaries.	250.00	3.40	850.00
04/09/2019	Michael S. Pomerantz	Review documents; conferences with Andrew Jacobson and Bryan King regarding discovery and document retention and organization.	250.00	1.50	375.00
04/10/2019	Bryan D. King	Review tax returns and case file; prepare notes re: same; review discovery.	250.00	4.00	1,000.00
04/11/2019	Bryan D. King	Review draft stipulation re: requests to admit; review document requests; revise notes re: financial statements and tax returns.	250.00	2.40	600.00
04/12/2019	Bryan D. King	Review discovery records, subpoena responses, and document productions.	250.00	2.10	525.00
04/15/2019	Bryan D. King	Review discovery documents; revise chronology; conference with M. Pomerantz re: same; conduct fact	250.00	6.40	1,600.00

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04/15/2019	Michael S. Pomerantz	Conferences with Bryan King; review and organize voluminous documents.	250.00	1.75	437.50
04/16/2019	Bryan D. King	Review financial statements, tax returns, and other documents; conference with M. Pomerantz re: same; conference call with M. Pomerantz and client re: same; review bank records and client emails.	250.00	5.40	1,350.00
04/16/2019	Michael S. Pomerantz	Numerous telephone calls and correspondences with client; review numerous documents and correspondences; work on document organization, discovery and strategy moving forward.	250.00	3.50	875.00
04/17/2019	Bryan D. King	Review tax returns and financial statements re: fraud claims; conference with A. Jacobson re: case status and strategy; prepare subpoena to attorney for Gerry Gleason's estate.	250.00	3.30	825.00
04/17/2019	Michael S. Pomerantz	Telephone calls and correspondence with client and Bryan King; work on subpoenas to Gleason Estate parties, et al.	250.00	1.50	375.00
04/18/2019	Bryan D. King	Prepare subpoena to Hardt, Stern & Kayne; review discovery responses; revise draft protective order.	250.00	3.50	875.00
04/18/2019	Michael S. Pomerantz	Correspondence with client; forward subpoenas to same; telephone call with same; obtain process server in AZ; further discovery issues.	250.00	1.75	437.50
04/19/2019	Bryan D. King	Emails re: Arizona subpoena; review general ledger documents and financials; prepare subpoena to Michael Gleason.	250.00	4.50	1,125.00
04/19/2019	Michael S. Pomerantz	Correspondence and telephone calls with client and Bryan King regarding discovery issues.	250.00	0.75	187.50
04/22/2019	Bryan D. King	Revise draft protective order; revise proposed stipulations; prepare draft 201(k) letter to opposing counsel re: document requests.	250.00	5.50	1,375.00
04/22/2019	Michael S. Pomerantz	Work on stipulations and responses to Ruscitti discovery; telephone call and correspondence with client and Bryan King.	250.00	1.50	375.00
04/23/2019	Bryan D. King	Review and analyze accounting records; prepare notes re: cast of characters and documents needed.	250.00	5.10	1,275.00
04/24/2019	Bryan D. King	Revise draft stipulation in lieu of requests for admission; review court documents; prepare correspondence to opposing counsel re: financial documents and discovery; conference with M. Pomerantz re: discovery issues.	250.00	3.70	925.00
04/24/2019	Michael S. Pomerantz	Conference with Bryan King; review documents produced; work on proposed discovery stipulations, protective order and 201(k) letter regarding	250.00	1.50	375.00

Exhibit 1 Page 18 of 53

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06/04/2019	Michael S. Pomerantz	Correspondence with client regarding bank statements, et al; conference with Bryan King; work on counter issues.	250.00	1.25	312.50
06/04/2019	Bryan D. King	Phone M. Pomerantz re: discovery status and protective order; phone Christina Lutz re: discovery issues; revise proposed stipulation; email re: discovery	250.00	1.70	425.00
06/03/2019	Michael S. Pomerantz	work on agreed confidentiality order and strategy moving forward.	250.00	1.00	250.00
06/03/2019	Bryan D. King	Correspondence with client regarding Suburban Bank; Review and revise proposed protective order.	250.00	0.50	125.00
05/31/2019	Bryan D. King	Phone opposing counsel re: document requests and protective order; emails re: same.	250.00	0.40	100.00
05/30/2019	Michael S. Pomerantz	Review documents received from Hardt Stern; conference with Bryan King.	250.00	1.00	250.00
05/30/2019	Bryan D. King	produced by Gleason attorneys. Emails regarding subpoenas; review documents	250.00	0.20	50.00
05/29/2019	Michael S. Pomerantz	client; review file. regarding Hardt Stern discovery; telephone call to	250.00	0.75	187.50
05/29/2019	Bryan D. King	Conference with Bryan King; review correspondence	250.00	0.10	25.00
05/24/2019	Bryan D. King	Emails re: response to subpoena. division complaint.	250.00	0.20	50.00
05/23/2019	Michael S. Pomerantz	Emails re: answer to counterclaim; review answer to law King.	250.00	0.25	62.50
05/20/2019	Bryan D. King	Correspondence with client; conference with Bryan stipulation and discovery issues.	250.00	0.60	150.00
05/17/2019	Bryan D. King	Review revised draft stipulation; emails re: draft	250.00	0.20	50.00
05/15/2019	Bryan D. King	Emails re: discovery issues. Phone Arizona attorney re: service of subpoena.	250.00	0.10	25.00
05/13/2019	Bryan D. King	subpoena. Emails re: Arizona subpoena; prepare notice of	250.00	0.50	125.00
05/09/2019	Bryan D. King	re: same. Phone opposing counsel re: discovery matters; emails	250.00	0.90	225.00
05/06/2019	Michael S. Pomerantz	subpoena. correspondence from Hardt and Stern regarding	250.00	1.50	375.00
04/30/2019	Michael S. Pomerantz	Review numerous documents from client; forward certain documents to Bryan King; review	250.00	0.25	62.50
04/25/2019	Bryan D. King	Conference with Andrew Jacobson; review correspondence with opposing counsel. opposing counsel re: discovery; email re: same.	250.00	2.00	500.00
		Review court file; review and analyze general ledger accounts and accountant workpapers; revise letters to reinsurance/warranty issues.			

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06/05/2019	Bryan D. King	Attend status hearing; review discovery documents.	250.00	1.10	275.00
06/05/2019	Michael S. Pomerantz	Review correspondence from client; review agreed confidentiality order and status entered; conference with Bryan King; telephone call to client.	250.00	1.00	250.00
06/10/2019	Bryan D. King	Prepare answer to counterclaim.	250.00	1.20	300.00
06/10/2019	Michael S. Pomerantz	Work on answer and affirmative defenses to counter claim; telephone call with client.	250.00	0.75	187.50
06/11/2019	Bryan D. King	Conference with M. Pomerantz re: answer to counterclaim.	250.00	0.30	75.00
06/11/2019	Michael S. Pomerantz	Work on answer and affirmative defenses to counter claim of Ruscitti, et al; telephone call to client; conferences with Bryan King; review numerous emails and documents from client.	250.00	1.50	375.00
06/12/2019	Bryan D. King	Emails re: answer to counterclaim; email re: summary of discovery status and issues.	250.00	0.60	150.00
06/12/2019	Michael S. Pomerantz	Correspondence from client; telephone call to same; conference with Bryan King regarding next steps; work list of same.	250.00	1.00	250.00
06/18/2019	Bryan D. King	Emails re: discovery issues and answer to counterclaim.	250.00	0.60	150.00
06/18/2019	Michael S. Pomerantz	Extended telephone call with client; work on and finalize answer to Ruscitti's counter claims review; correspondence from client.	250.00	1.50	375.00
06/19/2019	Bryan D. King	Emails re: prior representation of Richard Ruscitti.	250.00	0.20	50.00
06/20/2019	Bryan D. King	Emails re: alleged conflict of interest.	250.00	0.20	50.00
06/26/2019	Bryan D. King	Conference with M. Pomerantz re: discovery and litigation strategy; conference with M. Shiba re: motion for summary judgment.	250.00	2.40	600.00
06/26/2019	Michael Shiba	Analyze case materials to determine best way to draft partial motion for summary judgment.	250.00	0.50	125.00
06/26/2019	Michael S. Pomerantz	Review file and numerous documents; meeting with Bryan King regarding outstanding issues and strategy moving forward; extended telephone call with M Helmsstetter regarding same and documents needed for meeting tomorrow; review numerous emails from client; outline motion for partial ss as to Nissan.	250.00	2.75	687.50
06/27/2019	Bryan D. King	Emails re: discovery issues; conference with Mike Helmsstetter and Mike Pomerantz re: discovery and strategy; phone Steve Varhola re: case file; fact research re: distributions; email re: same; prepare subpoena riders re: cashing of dealership checks.	250.00	4.90	1,225.00

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07/10/2019	Michael S.	Conference with BK, review documents, work on phone CNA re: subpoena response.	250.00	1.20	300.00
07/10/2019	Bryan D. King	Revise letter to opposing counsel re: BUPD prior representation of Richard Ruscitti; email re: same; judgment motion to reflect ownership to dealership.	250.00	0.40	100.00
07/08/2019	Michael Shiba	Analyze purchase documents and edit summary representation of Richard Ruscitti.	250.00	3.50	875.00
07/05/2019	Bryan D. King	Prepare letter to opposing counsel re: BUPD prior possess stock in Nissan dealerships.	250.00	0.80	200.00
07/03/2019	Michael Shiba	Analyze file to determine how Helmsletter came to judgment motion.	250.00	0.40	100.00
07/03/2019	Michael Shiba	Research regarding summary judgment standard and draft no competing evidence portion of summary judgment motion.	250.00	1.80	450.00
07/03/2019	Bryan D. King	Conference with Michael Shiba re: motion for summary judgment; phone M. Pomerantz re: alleged conflict of interest.	250.00	1.00	250.00
07/02/2019	Michael S. Pomerantz	Work on finalize & serve subpoena to GMAN ally financial.	250.00	1.00	250.00
07/02/2019	Michael Shiba	Research regarding ways to establish ownership of stock for summary judgment and draft summary judgment motion.	250.00	6.60	1,650.00
07/02/2019	Bryan D. King	Prepare subpoenas to Suburban Bank & Trust, West Side Bank, Lakeside Bank, CNA, GM, and Ally Financial; prepare notices of subpoenas.	250.00	1.60	400.00
07/01/2019	Michael S. Pomerantz	SBT, west town bank, lakeside bank & CNA. Correspondence to client and SW along w/ protective order & status order. Review & finalize subpoenas to	250.00	1.50	375.00
07/01/2019	Michael Shiba	which you can prove stock ownership for summary judgment motion.	250.00	5.00	1,250.00
07/01/2019	Bryan D. King	Emails re: answer to counterclaim.	250.00	0.10	25.00
06/28/2019	Michael S. Pomerantz	Financial. Subpoena to SBT, West Town Bank, Lakeside Bank and CNA; work on subpoena to GM and Ally	250.00	1.50	375.00
06/28/2019	Bryan D. King	Review Helmsletter comments to answer, conference with Bryan King; finalize and file same; work on subpoenas; prepare proposed stipulation; review tax returns produced by defendants.	250.00	3.10	775.00
06/27/2019	Michael S. Pomerantz	Emails re: answer to counterclaim; attention to and regarding insurance companies. documents from client; work on subpoena to banks same and Bryan King; review numerous additional	250.00	3.75	937.50

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11/15/2019	Michael S. Pomerantz	Correspondence & telephone conference with Michael Helmssetter & Bankruptcy counsel regarding forensic	250.00	1.50	375.00
11/13/2019	Michael S. Pomerantz	Correspondence with client & Bryan King counsel.	250.00	0.25	62.50
11/12/2019	Michael S. Pomerantz	Telephone conference with client regarding forensic accounting, firm, et. al.	250.00	0.50	125.00
11/04/2019	Bryan D. King	Attend status hearing.	250.00	0.90	225.00
10/14/2019	Bryan D. King	Emails re: motion to disqualify and 201(k) conference.	250.00	0.10	25.00
10/03/2019	Bryan D. King	Review motion to disqualify.	250.00	0.10	25.00
10/02/2019	Michael S. Pomerantz	Review correspondence from opposing counsel & motion to disqualify Conference with Bryan King.	250.00	1.00	250.00
09/24/2019	Michael S. Pomerantz	to disqualify, third party citations, et. al.	250.00	0.50	125.00
09/23/2019	Bryan D. King	Conference with Bryan King regarding status, motion Emails re: status hearing and 201(k) conference.	250.00	0.20	50.00
07/30/2019	Michael S. Pomerantz	motion to Quash Et. Al. regarding conflict issue Review court order regarding Conference w/ BK Work on correspondence to O/C Ruscitti.	250.00	1.00	250.00
07/30/2019	Bryan D. King	Attend hearing re: motion to quash subpoenas; revise letter to Christina Lutz re: prior representation of	250.00	2.30	575.00
07/29/2019	Bryan D. King	Review letter from opposing counsel re: prior representation and client files; prepare response re: same.	250.00	1.30	325.00
07/24/2019	Michael S. Pomerantz	Additional correspondence with O/C regarding conflict Review correspondence from client Regarding Paul Naiteto reinsurance Co, & J Huell Briscoeass.	250.00	0.50	125.00
07/22/2019	Michael S. Pomerantz	subpoena response from West Town Bank. subpoenas, as well as motion to quash same. Review Review correspondence from O/C regarding bank	250.00	0.75	187.50
07/17/2019	Michael S. Pomerantz	from client review docs, telephone call to client.	250.00	0.50	125.00
07/12/2019	Bryan D. King	Review correspondence stock create & resolutions Phone CNA re: subpoena; phone GM re: subpoena.	250.00	0.40	100.00
07/11/2019	Michael S. Pomerantz	client. Ruscitti, Review correspondence & CNA info from Lutz regarding conflict & prior representation of	250.00	1.00	250.00
07/11/2019	Bryan D. King	Correspondence & NCs w/BK regarding bank subpoenas, work on & finalize correspondence to c same; finalize letter to opposing counsel re: alleged conflict of interest.	250.00	0.50	125.00
	Pomerantz	response to C Lutz regarding prior representation of			

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Expenses	Units	Price	Amount
02/14/2019 For services rendered by Federal Express-CHGO Inv 646721252 Gary Blackman Levenfeld Pearlshtein, LLC 2 N. LaSalle St Chicago IL 60602.	1.00	16.84	16.84
02/14/2019 For services rendered by Federal Express-CHGO Inv 646721252 Attn: Legal Department Kingdom Chevrolet 6603 S. Western Ave Chicago IL 60636.	1.00	16.84	16.84
02/14/2019 For services rendered by Federal Express-CHGO Inv 646721252	1.00	32.84	32.84
Sub-total Fees: \$54,087.50			
11/18/2019 Michael S. Pomerantz Correspondence & conferences with client & Bryan King regarding discovery, forensic accounting, et al.	250.00	0.75	187.50
11/21/2019 Bryan D. King Attend hearing re: motion to put case on bankruptcy calendar.	250.00	1.40	350.00
12/03/2019 Michael S. Pomerantz Correspondence with client Telephone call to same.	250.00	0.50	125.00
12/12/2019 Michael S. Pomerantz Correspondence with client & Bryan King.	250.00	0.25	62.50
01/28/2020 Michael S. Pomerantz Conference with Bryan King regarding status, bankruptcy, and trustee Review docs.	250.00	1.00	250.00
02/07/2020 Michael S. Pomerantz Telephone conference with Mike H Telephone call to bankruptcy trustee.	250.00	1.00	250.00
02/18/2020 Michael S. Pomerantz Telephone conference with client regarding bankruptcy, et al.	250.00	0.50	125.00
02/19/2020 Michael S. Pomerantz Review file & documents Correspondence & telephone conference with Bryan King Prepare for conversation with bankruptcy trustee regarding litigating in bankruptcy.	250.00	1.75	437.50
02/21/2020 Michael S. Pomerantz Correspondence with bankruptcy trustee Telephone call to same.	250.00	0.25	62.50
02/24/2020 Michael S. Pomerantz Conference with Bryan King; correspondence to bankruptcy trustee Extended telephone conference with same Review documents.	250.00	1.25	312.50
02/25/2020 Michael S. Pomerantz Correspondence with bankruptcy trustee Review additional documents Conference with Bryan King.	250.00	1.25	312.50
02/27/2020 Michael S. Pomerantz Review file and documents in preparation for meeting with bankruptcy trustee Work on summary.	250.00	2.25	562.50
02/28/2020 Michael S. Pomerantz Review file regarding attorneys lien Conference with Bryan King Extended meeting with bankruptcy trustee regarding continued representation Telephone call to client.	250.00	2.50	625.00

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02/14/2019	For services rendered by Federal Express-CHGO Inv 646721252	1.00	21.52	21.52
04/18/2019	Richard Ruscitti 4403 Basswood Lisle IL 60532.			
04/18/2019	For services rendered by Hardt, Stern & Kayne, PC Check No 14522	1.00	20.00	20.00
04/23/2019	Witness Fee.			
04/23/2019	For services rendered by Clerk of the Circuit Court Authorization	1.00	21.70	21.70
04/23/2019	NO 012760 Chancery Div Fees.			
04/23/2019	For services rendered by Clerk of the Circuit Court Check No 14530	1.00	30.00	30.00
04/24/2019	Subpeona.			
04/24/2019	For services rendered by Clerk of the Circuit Court Authorization	1.00	30.63	30.63
04/30/2019	No 08798D Chancery Division fees.			
04/30/2019	For services rendered by Protek International, Inc Inv 2019-3445	1.00	310.00	310.00
05/13/2019	Subpoena service in Arizona.			
05/13/2019	For services rendered by Federal Express-CHGO Inv 656019890	1.00	37.40	37.40
	John W. Blischak Blischak Law PLLC 3770 N. 7th Street Phoenix			
	AZ 85014.			
Sub-total Expenses:				
			\$537.77	Amount
Balance Due:			\$54,625.27	

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BROWN UDELL POMERANTZ & DELRAHIM, LTD.

Card Holder Signature

Card Holder Address

Card Holder Name

Amount

Expiration Date ____/____/____

Card Number

() Visa () MasterCard () American Express

Credit Card Authorization



Please return this page with your payment.

Remit to: Brown UdeLL Pomerantz & Delrahim, Ltd.
225 W. Illinois St., Suite 300
Chicago, IL 60654

Amount enclosed: \$ _____

() Credit Card

Payment Type: () Check/Money Order

Previous Statement Balance	0.00
Current Billing Activity	
Interest/Tax	0.00
Legal Services Rendered	54,087.50
Disbursements and Other Costs Incurred	537.77
Total Current Billing	54,625.27
Payments Received:	0.00
Total Now Due:	\$54,625.27

Statement No.: 158139

Statement as of 3/17/2020

Tax Identification No.: 36-2977153

Mike Helmsletter
465 N. Park Drive Apt. 308
Chicago, IL 60611



BROWN UDELL POMERANTZ & DELRAHIM, LTD.
Andrew A. Jacobson
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Chicago, IL 60654
Phone: (312) 475-9900 • Fax: (312) 475-1188
Email: AJACOBSON@BUPDLAW.COM
www.bupdlaw.com

February 14, 2019

VIA CERTIFIED MAIL & FEDERAL EXPRESS

Gary I. Blackman
Levenfeld Pearlstein, LLC
2 North LaSalle Street, Suite 1300
Chicago, IL 60602
gblackman@lplegal.com

Kingdom Chevrolet
6603 S. Western Ave.
Chicago, IL 60636

Western Ave. Nissan, Inc.
7410 S. Western Ave.
Chicago, IL 60629

Richard Ruscitti
4403 Basswood
Lisle, IL 60532

Re: Michael Helmstetter v. Richard Ruscitti, et al. (14 CH 20208)

Pursuant to 770 ILCS 5/1, please take notice that Michael Helmstetter has entered into a retainer agreement to compensate us for services rendered and to be rendered in connection with this matter from any amount that may be recovered by way of suit, settlement, or otherwise. Accordingly, Brown, Udell, Pomerantz & Delrahim, Ltd. asserts a lien pursuant to said statute.

Sincerely,

Andrew A. Jacobson

Invoice submitted to:
Mike Helmstetter
3419 South Parnell Ave.
Chicago, IL 60616

September 17, 2018

In Reference To: The Original Alpha Chicago LLC

Invoice # 146000

Matter # 5763-001-TR-18

Professional Fees

			Rate	Hours	Amount
08/01/2018	Michael S. Pomerantz	Correspondence with clients; Conference call with Scott K and Mike H.	495.00	0.50	247.50
08/02/2018	Michael S. Pomerantz	Telephone calls with clients; Conference call with same and bankruptcy counsel.	495.00	0.75	371.25
Sub-total Fees:					\$618.75
					Amount
Previous Balance:					\$8,291.25
Balance Due:					\$8,910.00

Mike Helmstetter
3419 South Parnell Ave.
Chicago, IL 60616

Tax Identification No.: 36-2977153

Statement as of 9/17/2018

Statement No.: 146000

Previous Statement Balance	8,291.25
Current Billing Activity	
Interest/Tax	0.00
Legal Services Rendered	618.75
Disbursements and Other Costs Incurred	0.00
Total Current Billing	618.75
Payments Received:	0.00
Total Now Due:	\$8,910.00



Payment Type: ☐ Check/Money Order

☐ Credit
Card

Amount enclosed: \$ _____

Remit to: Brown Udel Pomerantz & Delrahim,
Ltd.
225 W. Illinois St., Suite 300
Chicago, IL 60654

Please return this page with your payment.

Credit Card Authorization

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Card Number: _____

Expiration Date ____/____/____

Amount _____

Card Holder Name

Card Holder Address

Card Holder Signature

Invoice submitted to:
Mike Helmstetter
3419 South Parnell Ave.
Chicago, IL 60616

August 09, 2018

In Reference To: The Original Alpha Chicago LLC

Invoice # 145183

Matter # 5763-001-TR-18

Professional Fees

Professional Fees			Rate	Hours	Amount
07/23/2018	Michael S. Pomerantz	Correspondence and telephone calls with client regarding UCC sale, financing, bankruptcy, etc...; extended telephone call with bankruptcy counsel; correspondence with client regarding remaining information needed for bankruptcy petition.	495.00	1.00	495.00
			Sub-total Fees:		\$495.00
					Amount
			Previous Balance:		\$7,796.25
			Balance Due:		\$8,291.25

Mike Helmstetter
3419 South Parnell Ave.
Chicago, IL 60616

Tax Identification No.: 36-2977153

Statement as of 8/9/2018

Statement No.: 145183

Previous Statement Balance	7,796.25
Current Billing Activity	
Interest/Tax	0.00
Legal Services Rendered	495.00
Disbursements and Other Costs Incurred	0.00
Total Current Billing	495.00
Payments Received:	0.00
Total Now Due:	\$8,291.25



Payment Type: ☐ Check/Money Order

☐ Credit
Card

Amount enclosed: \$ _____

Remit to: Brown Udell Pomerantz & Delrahim,
Ltd.
225 W. Illinois St., Suite 300
Chicago, IL 60654

Please return this page with your payment.

Credit Card Authorization

☐ Visa ☐ MasterCard ☐ American Express

Card Number: _____

Expiration Date ____/____/____

Amount _____

Card Holder Name

Card Holder Address

Card Holder Signature

Invoice submitted to:
Mike Helmstetter
3419 South Parnell Ave.
Chicago, IL 60616

July 18, 2018

In Reference To: The Original Alpha Chicago LLC

Invoice # 144571

Matter # 5763-001-TR-18

Professional Fees

			Rate	Hours	Amount
06/14/2018	Michael S. Pomerantz	Several telephone calls and correspondence with clients; Correspondence with lender; Review and revise commitment letter for \$2.6 million; Correspondence to clients and send along with revisions to same.	495.00	1.50	742.50
06/21/2018	Michael S. Pomerantz	Numerous telephone calls and correspondence with Mike Helmstetter; Review SH's AGR (unsigned) received, articles of conversion, etc...; Review Nissan documents and numbers.	495.00	1.75	866.25
06/25/2018	Michael S. Pomerantz	Review correspondence and documents and termination letter received from clients; Telephone calls with same; Brief research regarding Indiana Law regarding improper dealer termination.	495.00	1.75	866.25
06/26/2018	Michael S. Pomerantz	Telephone call and correspondence with client regarding potential new matter; Review documents received; Review docket; Decline case with impending trial date.	495.00	1.75	866.25

Sub-total Fees: \$3,341.25

Amount

Previous Balance: \$4,455.00

Balance Due: \$7,796.25

Mike Helmstetter
3419 South Parnell Ave.
Chicago, IL 60616

Tax Identification No.: 36-2977153

Statement as of 7/18/2018

Statement No.: 144571

Previous Statement Balance	4,455.00
Current Billing Activity	
Interest/Tax	0.00
Legal Services Rendered	3,341.25
Disbursements and Other Costs Incurred	0.00
Total Current Billing	<u>3,341.25</u>
Payments Received:	0.00
Total Now Due:	<u>\$7,796.25</u>



Payment Type: ☐ Check/Money Order
☐ Credit Card

Credit Card Authorization

☐ Visa ☐ MasterCard ☐ American Express

Amount enclosed: \$ _____

Card Number: _____

Remit to: Brown Udell Pomerantz & Delrahim,
Ltd.
225 W. Illinois St., Suite 300
Chicago, IL 60654

Expiration Date ____/____/____

Amount _____

Please return this page with your payment.

Card Holder Name

Card Holder Address

Card Holder Signature

Invoice submitted to:
Mike Helmstetter
3419 South Parnell Ave.
Chicago, IL 60616

June 25, 2018

In Reference To: The Original Alpha Chicago LLC

Invoice # 144294

Matter # 5763-001-TR-18

Professional Fees

			Rate	Hours	Amount
05/01/2018	Michael S. Pomerantz	Telephone calls and correspondence with clients regarding attempted repossession, financing, et.al.	495.00	0.75	371.25
05/02/2018	Michael S. Pomerantz	Review correspondence from Nissan regarding parts stop, et. al; draft correspondence to Nissan regarding same and cause of floorplan issues; numerous correspondence and telephone calls with client.	495.00	1.50	742.50
05/03/2018	Michael S. Pomerantz	Numerous correspondence with clients and from Nissan; research regarding Indiana Motor Vehicle Code and Indiana deceptive franchise act.	495.00	1.50	742.50
05/09/2018	Michael S. Pomerantz	Numerous correspondence with clients regarding moody, financing, et. al.	495.00	1.00	495.00
Sub-total Fees:					\$2,351.25
					Amount
Previous Balance:					\$2,103.75
Balance Due:					\$4,455.00

Mike Helmstetter
3419 South Parnell Ave.
Chicago, IL 60616

Tax Identification No.: 36-2977153

Statement as of 6/25/2018

Statement No.: 144294

Previous Statement Balance	2,103.75
Current Billing Activity	
Interest/Tax	0.00
Legal Services Rendered	2,351.25
Disbursements and Other Costs Incurred	0.00
Total Current Billing	2,351.25
Payments Received:	0.00
Total Now Due:	\$4,455.00



Payment Type: ☐ Check/Money Order

☐ Credit
Card

Amount enclosed: \$ _____

Remit to: Brown Udell Pomerantz & Delrahim,
Ltd.
225 W. Illinois St., Suite 300
Chicago, IL 60654

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Card Number: _____

Expiration Date ____/____/____

Amount _____

Card Holder Name

Card Holder Address

Card Holder Signature

Invoice submitted to:
Mike Helmstetter
3419 South Parnell Ave.
Chicago, IL 60616

May 15, 2018

In Reference To: The Original Alpha Chicago LLC

Invoice # 143175

Matter # 5763-001-TR-18

Professional Fees

			Rate	Hours	Amount
04/09/2018	Michael S. Pomerantz	Review correspondence from client; telephone calls with client; conference with Bryan King regarding status and strategy moving forward.	495.00	0.50	247.50
04/27/2018	Michael S. Pomerantz	Telephone calls and correspondence with client; review threatening correspondence from Nissan; brief research regarding repossession; breach of the peace.	495.00	1.50	742.50
04/29/2018	Michael S. Pomerantz	Correspondence with client and Terry Gaouette; correspondence to Ace regarding profession and breach of the peace.	495.00	1.00	495.00
04/30/2018	Michael S. Pomerantz	Telephone calls with client regarding attempted repo; review correspondence from Craig Keys; draft correspondence to client and send along with Breach of Peace research.	495.00	1.25	618.75
Sub-total Fees:					\$2,103.75

Payments

03/09/2018	(ck # 64987179)				4,328.38
Sub-total Payments:					\$4,328.38
					Amount
Previous Balance:					\$4,328.38
Balance Due:					\$2,103.75

Mike Helmstetter
3419 South Parnell Ave.
Chicago, IL 60616

Tax Identification No.: 36-2977153

Statement as of 5/15/2018

Statement No.: 143175

Previous Statement Balance	4,328.38
Current Billing Activity	
Interest/Tax	0.00
Legal Services Rendered	2,103.75
Disbursements and Other Costs Incurred	0.00
Total Current Billing	2,103.75
Payments Received:	4,328.38
Total Now Due:	\$2,103.75



Payment Type: ☐ Check/Money Order

☐ Credit
Card

Amount enclosed: \$ _____

Remit to: Brown Udell Pomerantz & Delrahim,
Ltd.
225 W. Illinois St., Suite 300
Chicago, IL 60654

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Credit Card Authorization

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Card Number: _____

Expiration Date ____/____/____

Amount _____

Card Holder Name

Card Holder Address

Card Holder Signature

Invoice submitted to:
Mike Helmstetter
3419 South Parnell Ave.
Chicago, IL 60616

October 23, 2018

In Reference To: New City Historic Auto Row LLC adv. Santander Bank, N.A. (18-CV-201)

Invoice # 147143

Matter # 5763-002-LI-18

Professional Fees			Rate	Hours	Amount
10/01/2018	Bryan D. King	Review motion to intervene.	475.00	0.30	142.50
10/02/2018	Michael S. Pomerantz	Review motion to intervene by Fort Worth Bros; review Santander's motion for substitution of counsel and order granting same; correspondence and telephone call with Bryan King regarding 10/9 hearing and withdrawal.	495.00	0.75	371.25
10/03/2018	Bryan D. King	Prepare motion to withdraw.	475.00	1.30	617.50
10/03/2018	Michael S. Pomerantz	Review and file motion to withdraw.	495.00	0.50	247.50
10/05/2018	Margaux Steffy	Review court order requiring service of motion to withdraw on client personally (.2); attention to service issues (.2).	395.00	0.40	158.00
10/05/2018	Michael S. Pomerantz	Telephone call and correspondence with client regarding motion to withdraw and appearance.	495.00	0.75	371.25
10/08/2018	Margaux Steffy	Review motion to withdraw in preparation for hearing (.2); preview emails regarding service of motion on client per judge's order (.2); read and respond to email from client regarding hearing location (.2).	395.00	0.60	237.00
10/09/2018	Margaux Steffy	Appear in Court on Motion to Withdraw.	395.00	1.80	711.00
10/11/2018	Michael S. Pomerantz	Review order granting motion to withdraw.	495.00	0.25	123.75
Sub-total Fees:					\$2,979.75

Expenses		Units	Price	Amount
10/03/2018	For services rendered by Federal Express-CHGO Inv 633299976 Michael Moody New City Historic Auto Row LLC 55 W Wacker Dr Chicago IL 60601.	1.00	19.74	19.74
10/03/2018	For services rendered by Federal Express-CHGO Inv 633299976 Michael S. Helmstetter New City Historic Auto Row LLC 3419 S. Parnell Ave Chicago IL 60616.	1.00	24.24	24.24

10/05/2018	For services rendered by Carlson Investigations, Inc Inv S667346-00 Service on New City Historic Auto Row LLC c/o Michael S. Helmstetter 3419 S. parnell Ave.	1.00	80.00	80.00
Sub-total Expenses:				<u>\$123.98</u>
				Amount
Previous Balance:				<u>\$29,908.54</u>
Balance Due:				\$33,012.27

Mike Helmstetter
3419 South Parnell Ave.
Chicago, IL 60616

Tax Identification No.: 36-2977153

Statement as of 10/23/2018

Statement No.: 147143

Previous Statement Balance	29,908.54
Current Billing Activity	
Interest/Tax	0.00
Legal Services Rendered	2,979.75
Disbursements and Other Costs Incurred	123.98
Total Current Billing	3,103.73
Payments Received:	0.00
Total Now Due:	\$33,012.27



Payment Type: () Check/Money Order

() Credit
Card

Amount enclosed: \$ _____

Remit to: Brown Udell Pomerantz & Delrahim,
Ltd.
225 W. Illinois St., Suite 300
Chicago, IL 60654

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Card Number: _____

Expiration Date ____/____/____

Amount _____

Card Holder Name

Card Holder Address

Card Holder Signature

Invoice submitted to:
Mike Helmstetter
3419 South Parnell Ave.
Chicago, IL 60616

October 08, 2018

In Reference To: New City Historic Auto Row LLC adv. Santander Bank, N.A. (18-CV-201)

Invoice # 146540

Matter # 5763-002-LI-18

Professional Fees

Professional Fees			Rate	Hours	Amount
09/25/2018	Michael S. Pomerantz	Review correspondence with client and order lifting stay; Correspondence with client and Bryan King.	495.00	0.25	123.75
			Sub-total Fees:		\$123.75
					Amount
			Previous Balance:		\$29,784.79
			Balance Due:		\$29,908.54

Mike Helmstetter
3419 South Parnell Ave.
Chicago, IL 60616

Tax Identification No.: 36-2977153

Statement as of 10/8/2018

Statement No.: 146540

Previous Statement Balance	29,784.79
Current Billing Activity	
Interest/Tax	0.00
Legal Services Rendered	123.75
Disbursements and Other Costs Incurred	0.00
Total Current Billing	123.75
Payments Received:	0.00
Total Now Due:	\$29,908.54



Payment Type: () Check/Money Order

() Credit
Card

Amount enclosed: \$ _____

Remit to: Brown UdeU Pomerantz & Delrahim,
Ltd.
225 W. Illinois St., Suite 300
Chicago, IL 60654

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Credit Card Authorization

() Visa () MasterCard () American Express

Card Number: _____

Expiration Date ____/____/____

Amount _____

Card Holder Name

Card Holder Address

Card Holder Signature

Invoice submitted to:
Mike Helmstetter
3419 South Parnell Ave.
Chicago, IL 60616

September 17, 2018

In Reference To: New City Historic Auto Row LLC adv. Santander Bank, N.A. (18-CV-201)

Invoice # 146001

Matter # 5763-002-LI-18

Professional Fees			Rate	Hours	Amount
08/01/2018	Michael S. Pomerantz	Correspondence with clients; Conference call with Scott K and Mike H.	495.00	0.50	247.50
08/02/2018	Michael S. Pomerantz	Telephone calls with clients; Conference call with same and bankruptcy counsel.	495.00	0.75	371.25
08/03/2018	Michael S. Pomerantz	Conference call with Bryan King; Review correspondence from FCA counsel regarding protest; Telephone calls with client; Work on response letter.	495.00	1.00	495.00
08/15/2018	Bryan D. King	Conference with M. Pomerantz re: status and strategy; conference call w/ M. Pomerantz and client re: same.	475.00	1.00	475.00
08/15/2018	Michael S. Pomerantz	Extended telephone call with Mike Helmstetter regarding status of bankruptcies and tomorrows status hearing; Review correspondence from same; Conference with Bryan King regarding status hearing tomorrow.	495.00	0.75	371.25
08/16/2018	Bryan D. King	Attend status hearing.	475.00	1.30	617.50
08/20/2018	Michael S. Pomerantz	Review correspondence from Mike Helmstetter and Mike Moody, along with Fort Worth Motion; Telephone call to same.	495.00	1.00	495.00
08/24/2018	Michael S. Pomerantz	Review correspondence from client and Santander article; Conference with Bryan King regarding status of bankruptcy reorg/forward article to same.	495.00	0.75	371.25
Sub-total Fees:					<u>\$3,443.75</u>
					Amount
Previous Balance:					<u>\$26,341.04</u>
Balance Due:					<u>\$29,784.79</u>

Mike Helmstetter
3419 South Parnell Ave.
Chicago, IL 60616

Tax Identification No.: 36-2977153

Statement as of 9/17/2018

Statement No.: 146001

Previous Statement Balance	26,341.04
Current Billing Activity	
Interest/Tax	0.00
Legal Services Rendered	3,443.75
Disbursements and Other Costs Incurred	0.00
Total Current Billing	3,443.75
Payments Received:	0.00
Total Now Due:	\$29,784.79



Payment Type: ☐ Check/Money Order

☐ Credit
Card

Amount enclosed: \$ _____

Remit to: Brown UdeU Pomerantz & Delrahim,
Ltd.
225 W. Illinois St., Suite 300
Chicago, IL 60654

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Card Number: _____

Expiration Date ____/____/____

Amount _____

Card Holder Name

Card Holder Address

Card Holder Signature

Invoice submitted to:
Mike Helmstetter
3419 South Parnell Ave.
Chicago, IL 60616

August 09, 2018

In Reference To: New City Historic Auto Row LLC adv. Santander Bank, N.A. (18-CV-201)

Invoice # 145184

Matter # 5763-002-LI-18

Professional Fees			Rate	Hours	Amount
07/02/2018	Michael S. Pomerantz	Numerous correspondence with client and Ultegra regarding take-out loan, et. al; Telephone call with same.	495.00	1.00	495.00
07/03/2018	Michael S. Pomerantz	Correspondence and telephone calls with clients regarding new loan potential, et. al.	495.00	0.50	247.50
07/05/2018	Michael S. Pomerantz	Review numerous correspondence from clients and default letters; Telephone calls with same; Review redlined APA from Ultegra and several correspondence with client regarding same; Telephone calls with same.	495.00	0.50	247.50
07/06/2018	Michael S. Pomerantz	Correspondence and telephone calls with clients; Review notice of UCC sale and correspondence from opposing counsel.	495.00	0.75	371.25
07/09/2018	Michael S. Pomerantz	Review correspondence from opposing counsel regarding UCC sale; Correspondence to clients and send along with same; Review agreed scheduling order from Illinois Motor Vehicle Review Board; Correspondence to clients and send along with same; Telephone calls with clients regarding above and strategy moving forward.	495.00	1.25	618.75
07/11/2018	Michael S. Pomerantz	Telephone calls with clients regarding Santander, take-out loan, etc....	495.00	0.50	247.50
07/13/2018	Bryan D. King	Review answer to amended counterclaim.	475.00	0.20	95.00
07/16/2018	Michael S. Pomerantz	Numerous correspondence and telephone calls with Rob Glantz and clients regarding bankruptcy filing; Conference with Bryan King regarding same and tomorrow's status hearing.	495.00	1.75	866.25
07/17/2018	Bryan D. King	Attend status hearing.	475.00	1.90	902.50
07/17/2018	Michael S. Pomerantz	Numerous telephone calls and correspondence with client; Review court order entered; Telephone call with bankruptcy counsel.	495.00	1.00	495.00
07/20/2018	Michael S.	Review correspondence from FCA regarding	495.00	1.25	618.75

	Pomerantz	supplemental notice of termination, et. al; Numerous correspondence and telephone calls with clients regarding same, UCC sale and bankruptcy filing; Review correspondence regarding financing.			
07/23/2018	Michael S. Pomerantz	Telephone calls with client; extended telephone call with bankruptcy counsel; conference call with MH and bankruptcy counsel.	495.00	0.75	371.25
07/24/2018	Bryan D. King	Review Santander's supplemental disclosures.	475.00	0.30	142.50
07/24/2018	Michael S. Pomerantz	Numerous telephone calls and correspondence with clients and bankruptcy counsel; several telephone calls and correspondence regarding FCA mediation and UCC sale.	495.00	1.25	618.75
07/25/2018	Bryan D. King	Review bankruptcy petition; prepare letters to opposing counsel re: same.	475.00	0.70	332.50
07/25/2018	Michael S. Pomerantz	Numerous telephone calls and correspondence with clients and bankruptcy counsel regarding filings; notices to opposing counsel's and FCA regarding same and meditation.	495.00	1.00	495.00
07/26/2018	Michael S. Pomerantz	Brief research regarding necessity of notice, pending litigation and arbitration, et. al; correspondence and telephone calls with client regarding same; correspondence with FCA arbitrator; review 5 day demand notice lease from client.	495.00	0.75	371.25
07/27/2018	Michael S. Pomerantz	Telephone calls and correspondence with clients; review Santander filing etc.	495.00	1.25	618.75
07/30/2018	Michael S. Pomerantz	Telephone calls and correspondences with clients regarding bankruptcy filing, choice of counsel, etc....	495.00	1.00	495.00
07/31/2018	Michael S. Pomerantz	Telephone calls with clients.	495.00	0.75	371.25
Sub-total Fees:					\$9,021.25

Payments

07/25/2018	(ck # 11844)				15,000.00
Sub-total Payments:					\$15,000.00
					Amount
Previous Balance:					\$32,319.79
Balance Due:					\$26,341.04

Mike Helmstetter
3419 South Parnell Ave.
Chicago, IL 60616

Tax Identification No.: 36-2977153

Statement as of 8/9/2018

Statement No.: 145184

Previous Statement Balance	32,319.79
Current Billing Activity	
Interest/Tax	0.00
Legal Services Rendered	9,021.25
Disbursements and Other Costs Incurred	0.00
Total Current Billing	9,021.25
Payments Received:	15,000.00
Total Now Due:	\$26,341.04



Payment Type: ☐ Check/Money Order

☐ Credit
Card

Amount enclosed: \$ _____

Remit to: Brown Udell Pomerantz & Delrahim,
Ltd.
225 W. Illinois St., Suite 300
Chicago, IL 60654

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Expiration Date ____/____/____

Amount _____

Card Holder Name

Card Holder Address

Card Holder Signature

Invoice submitted to:
Mike Helmstetter
3419 South Parnell Ave.
Chicago, IL 60616

July 18, 2018

In Reference To: New City Historic Auto Row LLC adv. Santander Bank, N.A. (18-CV-201)

Invoice # 144572

Matter # 5763-002-LI-18

Professional Fees			Rate	Hours	Amount
06/04/2018	Bryan D. King	Review motion to dismiss and prepare notes re: same; prepare mandatory initial disclosures.	475.00	2.00	950.00
06/04/2018	Michael S. Pomerantz	Numerous correspondence with clients; Telephone calls with Scott Kinney and Adam Wimmer regarding financing; Review commitment letter from Wimmer; Review motion to dismiss filed by plaintiff; Conference with Bryan King regarding same and initial disclosures.	495.00	1.50	742.50
06/05/2018	Bryan D. King	Revise initial disclosures; phone M. Pomerantz re: motion to dismiss and strategy.	475.00	1.30	617.50
06/05/2018	Michael S. Pomerantz	Numerous telephone calls and correspondence with clients regarding AMD counsel claims, initial disclosures and financing; Review documents and other information received from client; Correspondence and telephone call with opposing counsel regarding potential resolution; Conference call with SK and TG.	495.00	2.50	1,237.50
06/06/2018	Bryan D. King	Review client documents for initial disclosures; revise initial disclosures.	475.00	2.60	1,235.00
06/06/2018	Michael S. Pomerantz	Numerous correspondence and telephone calls with clients; Review documents and prepare list of missing information for clients and forward same to clients; Conferences with Bryan King regarding same and tomorrow's hearing.	495.00	1.75	866.25
06/07/2018	Bryan D. King	Attend hearing re: motion to dismiss counterclaim; revise initial disclosures; conference with M. Pomerantz re: same; review and redact documents for production.	475.00	5.00	2,375.00
06/07/2018	Michael S. Pomerantz	Numerous correspondence and telephone calls with client regarding potential resolution, Fort Worth Litigation, Alpha Recalls, initial disclosures, etc; Correspondence with opposing counsel; Conferences with Bryan King regarding disclosures.	495.00	2.75	1,361.25

06/08/2018	Bryan D. King	Emails re: initial disclosure of damages calculations; revise initial disclosures.	475.00	1.40	665.00
06/08/2018	Michael S. Pomerantz	Continued work on federal disclosures, damages, and interest calculations; Numerous telephone calls and correspondence.	495.00	2.00	990.00
06/11/2018	Bryan D. King	Phone Terry Gaouette re: interest charges; revise initial disclosures; review documents re: interest charges; phone M. Pomerantz re: same; phone Scott Kindybalyk re: interest charges and initial disclosures.	475.00	2.00	950.00
06/11/2018	Michael S. Pomerantz	Numerous correspondence and telephone calls; Continued work on initial disclosures and interest damages; Review numerous emails and calculations from client; Telephone call with Jonathan Young at Santander.	495.00	1.75	866.25
06/12/2018	Michael S. Pomerantz	Review defendant's mandatory initial discovery responses; Conference with Bryan King; Correspondence with client.	495.00	1.00	495.00
06/13/2018	Bryan D. King	Review plaintiff's initial disclosures.	475.00	0.20	95.00
06/13/2018	Michael S. Pomerantz	Correspondence and telephone calls with clients.	495.00	0.75	371.25
06/14/2018	Bryan D. King	Review FCA dealer agreement re: default provisions.	475.00	0.20	95.00
06/15/2018	Michael S. Pomerantz	Review revised commitment letter; Correspondence with lender and clients; Forward commitment letter to Santander counsel; Correspondence to and from Santander counsel and forward to clients; review \$5 million and \$20 million commitment letters from Santanders.	495.00	1.50	742.50
06/18/2018	Michael S. Pomerantz	Telephone calls and correspondence with clients; Correspondence with opposing counsel; Work on Ultegra issues.	495.00	1.50	742.50
06/19/2018	Bryan D. King	Begin preparing amended counterclaim.	475.00	2.10	997.50
06/19/2018	Michael S. Pomerantz	Correspondence and telephone calls with clients regarding Santander, Ultegra, et. al; Correspondence with Ultegra.	495.00	1.00	495.00
06/20/2018	Bryan D. King	Conference with M. Pomerantz re: strategy and settlement; email opposing counsel re: deadline to file amended counterclaim.	475.00	0.30	142.50
06/20/2018	Michael S. Pomerantz	Telephone calls with clients; Conference with Bryan King regarding amended CDC's; Work on same; Correspondence with opposing counsel regarding same and potential resolution.	495.00	1.25	618.75
06/21/2018	Bryan D. King	Continue drafting amended counterclaim.	475.00	2.50	1,187.50
06/21/2018	Michael S. Pomerantz	Numerous telephone calls with clients; Conference call with same and potential lenders; Work on	495.00	1.75	866.25

		amended counter claims.			
06/22/2018	Bryan D. King	Revise amended counterclaim; email re: same.	475.00	0.40	190.00
06/22/2018	Michael S. Pomerantz	Telephone calls and correspondence with clients regarding Ultegra, Indiana investors, et. al; Work on tortious interference claim.	495.00	1.25	618.75
06/25/2018	Bryan D. King	Phone M. Pomerantz re: counterclaim and strategy; revise amended counterclaim.	475.00	2.20	1,045.00
06/25/2018	Michael S. Pomerantz	Correspondence and telephone calls with lender and clients; Work on and finalize amended counter claims; Draft correspondence to clients and send along with same; Review numerous correspondence and documents from clients and accountant; Extended conference call with lender and clients.	495.00	2.25	1,113.75
06/26/2018	Bryan D. King	Legal research re: intentional interference with contract; conference with M. Pomerantz re: amended counterclaim; revise same.	475.00	1.70	807.50
06/26/2018	Michael S. Pomerantz	Telephone calls and correspondence with clients, lender, et. al regarding potential loan/sale, amended counterclaims, etc; Work on amended verified counterclaims; Telephone calls and correspondence regarding landlord issues.	495.00	1.75	866.25
06/27/2018	Michael S. Pomerantz	Numerous telephone calls and correspondence with clients; Finalize 1st amended counterclaims and send to client for review and verification; Work on APA/Saleback AGR with Ultegra.	495.00	3.75	1,856.25
06/27/2018	Michael S. Pomerantz	Correspondence to client regarding Indiana Vehicle Franchise Law and unfair practices; Telephone calls with same and termination notice.	495.00	1.00	495.00
06/28/2018	Bryan D. King	Prepare amended counterclaim and exhibits for filing.	475.00	0.50	237.50
06/28/2018	Michael S. Pomerantz	Numerous telephone calls and correspondence with client; Work on Ultegra APA and Buyback AGR.	495.00	3.00	1,485.00
06/29/2018	Michael S. Pomerantz	Work on and finalize APA/Buy-back AGR with Ultegra; Draft correspondence to client and send along with same; Correspondence and telephone calls with client regarding Lockhart Funding, et. al.	495.00	2.50	1,237.50
			Sub-total Fees:		\$29,657.50

Write-offs

07/23/2018	Courtesy Discount per Michael Pomerantz				6,105.00
			Sub-total Write-offs:		\$6,105.00
					Amount

Previous Balance:	\$8,767.29
Total Writeoffs:	\$6105.00
Balance Due:	\$32,319.79

Mike Helmstetter
3419 South Parnell Ave.
Chicago, IL 60616

Tax Identification No.: 36-2977153

Statement as of 7/18/2018

Statement No.: 144572

Previous Statement Balance	8,767.29
Current Billing Activity	
Interest/Tax	0.00
Legal Services Rendered	29,657.50
Disbursements and Other Costs Incurred	0.00
Total Current Billing	29,657.50
Payments Received:	6,105.00
Total Now Due:	\$32,319.79



Payment Type: ☐ Check/Money Order

☐ Credit
Card

Amount enclosed: \$ _____

Remit to: Brown Udell Pomerantz & Delrahim,
Ltd.
225 W. Illinois St., Suite 300
Chicago, IL 60654

Please return this page with your payment.

Credit Card Authorization

☐ Visa ☐ MasterCard ☐ American Express

Card Number: _____

Expiration Date ____/____/____

Amount _____

Card Holder Name

Card Holder Address

Card Holder Signature

Pre-bill

Closing Date 4/7/2020

Mike Helmstetter
465 N. Park Drive Apt. 308
Chicago, IL 60611

Matter ID: 5763-004-LI-19

Opened: 1/8/2019

Status: Open

YTD Billed Fees:

YTD Costs:

YTD Paid:

Procuring Attorney MSP

Helmstetter General Matter

Professional Fees

				Hours	Rate	Amount
11/21/2018	104039	MSP	(ON HOLD) Correspondence and telephone call with client regarding pending matters and estate planning	0.50	495.00	247.50
11/28/2018	104118	MSP	(ON HOLD) Correspondence and telephone calls with client and Lindsey Marcus regarding estate planning	0.50	495.00	247.50
11/29/2018	104121	MSP	(ON HOLD) Review documents; telephone call with client regarding estate planning, pending matters; correspondence and telephone call with Lindsey Marcus	1.25	495.00	618.75
12/05/2018	104883	MSP	(ON HOLD) Telephone calls with client and Andrew Jacobson; telephone call with bankruptcy counsel; several correspondence with FCA Arbitrator and opposing counsel	0.75	495.00	371.25
12/06/2018	104888	MSP	(ON HOLD) Correspondence with FCA Arbitrator and opposing counsel; conference with Bryan King	0.50	495.00	247.50
12/07/2018	104892	MSP	(ON HOLD) Correspondence with FCA Arbitrator; telephone call with client; review numerous correspondence and documents from client	2.00	495.00	990.00

Pre-bill

12/13/2018	105154	MSP	(ON HOLD) Review correspondence from FCA and court order; conference with Bryan King; Review proposed settlement agreement with Nissan; review correspondence from client and bankruptcy counsel; telephone call with client and correspondence with client	1.75	495.00	866.25
12/17/2018	105459	MSP	(ON HOLD) Telephone calls with client, bankruptcy counsel et. al; telephone call with bankruptcy counsel	1.00	495.00	495.00
12/18/2018	105460	MSP	(ON HOLD) Telephone call with client; review numerous correspondence and documents from client; refer client to Kevin Benjamin, bankruptcy counsel	1.75	495.00	866.25
12/20/2018	105461	MSP	(ON HOLD) Telephone call with client; discuss various issues and actions by bankruptcy counsel	1.00	495.00	495.00
01/08/2019	105961	MSP	(ON HOLD) Review correspondence from FCA and motion to dismiss protest; telephone call with client	1.00	495.00	495.00
01/14/2019	105975	MSP	(ON HOLD) Review FCA arbitration materials and correspondence; correspondence to client and bankruptcy counsel regarding same and dismissal or protest action; correspondence to Kuchler (arbitrator)	1.50	495.00	742.50
01/15/2019	106329	MSP	(ON HOLD) Correspondence with mediator, client and bankruptcy counsel; telephone call to bankruptcy counsel, telephone call with client; conference with Bryan King	1.00	495.00	495.00
01/24/2019	106637	MSP	(ON HOLD) Numerous correspondence and telephone calls regarding FCA, et. al.	0.75	495.00	371.25
01/28/2019	106898	MSP	(ON HOLD) Numerous correspondence with client and accountants	1.00	495.00	495.00
01/29/2019	106926	MSP	(ON HOLD) Correspondence and call with client	0.50	495.00	247.50
01/29/2019	106927	MSP	(ON HOLD) Correspondence and call with client	0.50	495.00	247.50
01/31/2019	106952	MSP	(ON HOLD) Numerous correspondence and telephone calls regarding Alpha Mediation, etc...	0.75	495.00	371.25

Pre-bill

02/05/2019	107644	MSP	(ON HOLD) Review dismissal of Alpha Romeo Bankruptcy; telephone call with client	0.50	495.00	247.50
02/11/2019	107779	MSP	(ON HOLD) Correspondence with James Lessmelster, et. al; telephone call with client.	0.50	495.00	247.50
02/13/2019	107791	MSP	(ON HOLD) Correspondence with James L; forward numerous to same regarding New City; finalize and forward attorney's lien letter to Ruscitti and his counsel.	1.00	495.00	495.00

ON HOLD: 9900.00

Sub-total Fees: \$9,900.00

	Fees	Disb	Total	Total Current Billing:	\$0.00
Current A/R Balance	0.00	0.00	0.00	Previous Balance Due:	\$0.00
+/- Unbilled Fees/Disb	9,900.00		9,900.00	Total Payments:	
Balance if billed in full	9,900.00	0.00	9,900.00	Total Write-offs:	
				Total Now Due:	\$0.00